

Exhibit F

From: Kathryn Allen <Kathryn.Allen@oag.texas.gov>
Sent: Wednesday, October 19, 2022 1:58 PM
To: Reeder-Ricchetti, Emily
Cc: Raymond Winter; Lollar, Tirzah; andrew@hackerstephens.com; Martin, Meghan C.; Eugenia Krieg; Drew Wright; Sinty Chandy; Christopher Hilton; Amy Hilton; Benjamin Walton; heather@hackerstephens.com; Sheehan, Christian; Odell, Christopher M.; Margolis, Craig D.; zzz.External.lgodesky@omm.com; brown@blackburnbrownlaw.com; zzz.External.jchapa@omm.com; Michael Moore; zzz.External.dashby@omm.com; Weberman, Melissa L.; Ramer, Paula; Schultz, Leah; Ana Aranda; Pieper, Megan; Gerstner, Alyssa; Jennifer Rowell; Rhonda Rodriguez; Janice Garrett; Carrie Killion
Subject: RE: Case 2:21-cv-00022-Z United States of America et al v. Planned Parenthood Federation of America Inc et al

External E-mail

Emily,

The State's position is that Affiliate Defendants' proposed "renewed" motion to compel is premature. To date, the State has produced approximately 206,000 pages of documents and continues to make rolling productions and timely responding to discovery in accordance with the operative Scheduling Order and the rules of civil procedure. We remain open to meeting and conferring if there are any specific questions and to resolve any outstanding items without burdening the Court.

The following responds to each item raised in your email below:

1. We anticipate providing verified interrogatory responses this week.
2. We anticipate substantially completing the rolling document production in response to Defendants' first set of requests for production by using the agreed search terms and identified custodians within two weeks. A hit report will be premature until then, but we anticipate providing a hit report after the rolling production is complete.
3. We stand on our objections to running search terms across David Maxwell's custodial files.
4. We oppose expedited briefing on any filing related to this.

Please let us know if you would like to discuss.

Best regards,

Kathryn Allen

Kathryn B. Allen
Assistant Attorney General
Civil Medicaid Fraud Division
Texas Office of the Attorney General
(512) 936-1576

From: Reeder-Ricchetti, Emily <Emily.Reeder-Ricchetti@arnoldporter.com>

Sent: Wednesday, October 19, 2022 7:46:14 AM

To: Raymond Winter <Raymond.Winter@oag.texas.gov>; Lollar, Tirzah <Tirzah.Lollar@arnoldporter.com>; Andrew Stephens <andrew@hackerstephens.com>; Martin, Meghan C. <Meghan.Martin@arnoldporter.com>

Cc: Eugenia Krieg <Eugenia.Krieg@oag.texas.gov>; Drew Wright <Drew.Wright@oag.texas.gov>; Sinty Chandy <Sinty.Chandy@oag.texas.gov>; Christopher Hilton <Christopher.Hilton@oag.texas.gov>; Amy Hilton <Amy.Hilton@oag.texas.gov>; Benjamin Walton <Benjamin.Walton@oag.texas.gov>; Heather Hacker <heather@hackerstephens.com>; Sheehan, Christian <Christian.Sheehan@arnoldporter.com>; Odell, Christopher M. <Christopher.Odell@arnoldporter.com>; Margolis, Craig D. <Craig.Margolis@arnoldporter.com>; lgodesky@omm.com <lgodesky@omm.com>; brown@blackburnbrownlaw.com <brown@blackburnbrownlaw.com>; jchapa@omm.com <jchapa@omm.com>; Michael Moore <Michael.Moore@oag.texas.gov>; dashby@omm.com <dashby@omm.com>; Weberman, Melissa L. <Melissa.Weberman@arnoldporter.com>; Ramer, Paula <Paula.Ramer@arnoldporter.com>; Schultz, Leah <Leah.Schultz@arnoldporter.com>; Ana Aranda <Ana.Aranda@oag.texas.gov>; Pieper, Megan <Megan.Pieper@arnoldporter.com>; Gerstner, Alyssa <Alyssa.Gerstner@arnoldporter.com>; Jennifer Rowell <Jennifer.Rowell@oag.texas.gov>; Rhonda Rodriguez <Rhonda.Rodriguez@oag.texas.gov>; Janice Garrett <Janice.Garrett@oag.texas.gov>; Carrie Killion <Carrie.Killion@oag.texas.gov>

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Ray,

Following up on the meet and confer on September 21 and the parties' communications over the last several weeks, Affiliate Defendants intend to renew their motion to compel Texas with respect to amended and verified interrogatories, and also request that the Court set a deadline for Texas's production of custodial documents responsive to Affiliate Defendants' First Set of RFPs. Two-and-a-half months have passed since Texas agreed to produce custodial documents and amend its responses, and Affiliates have only received a few small productions. They have not received a hit report for the search terms or any amended or verified interrogatory responses. Affiliate Defendants are also going to ask the Court to compel Texas to run Affiliate Defendants' tailored search terms across David Maxwell's custodial data, and to produce or privilege log any responsive documents.

Given the impending discovery deadline, Affiliate Defendants will request expedited briefing on this motion with Texas's response due October 27 and Affiliates' Reply due October 31. Please let us know Texas's positions on the motion to compel and the motion for expedited briefing.

Thanks,
Emily

Emily Reeder-Ricchetti
Associate | [Bio](#)

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From: Raymond Winter <Raymond.Winter@oag.texas.gov>

Sent: Tuesday, October 4, 2022 5:51 PM

To: Lollar, Tirzah <Tirzah.Lollar@arnoldporter.com>; Andrew Stephens <andrew@hackerstephens.com>; Martin, Meghan C. <Meghan.Martin@arnoldporter.com>

Cc: Eugenia Krieg <Eugenia.Krieg@oag.texas.gov>; Drew Wright <Drew.Wright@oag.texas.gov>; Sinty Chandy <Sinty.Chandy@oag.texas.gov>; Christopher Hilton <Christopher.Hilton@oag.texas.gov>; Amy Hilton <Amy.Hilton@oag.texas.gov>; Benjamin Walton <Benjamin.Walton@oag.texas.gov>; Heather Hacker

<heather@hackerstephens.com>; Sheehan, Christian <Christian.Sheehan@arnoldporter.com>; Odell, Christopher M. <Christopher.Odell@arnoldporter.com>; Margolis, Craig D. <Craig.Margolis@arnoldporter.com>; zzz.External.lgodesky@omm.com <lgodesky@omm.com>; brown@blackburnbrownlaw.com; zzz.External.jchapa@omm.com <jchapa@omm.com>; Michael Moore <Michael.Moore@oag.texas.gov>; zzz.External.dashby@omm.com <dashby@omm.com>; Weberman, Melissa L. <Melissa.Weberman@arnoldporter.com>; Ramer, Paula <Paula.Ramer@arnoldporter.com>; Reeder-Ricchetti, Emily <Emily.Reeder-Ricchetti@arnoldporter.com>; Schultz, Leah <Leah.Schultz@arnoldporter.com>; Ana Aranda <Ana.Aranda@oag.texas.gov>; Jennifer Rowell <Jennifer.Rowell@oag.texas.gov>; Rhonda Rodriguez <Rhonda.Rodriguez@oag.texas.gov>; Janice Garrett <Janice.Garrett@oag.texas.gov>; Carrie Killion <Carrie.Killion@oag.texas.gov>

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Good afternoon, Tirzah. We are working on a Hit Report and will get back to you. We are also working on our first privilege log and hope to have it soon, hopefully, by the end of this week. Our review of the agreed upon custodians' email boxes using the agreed upon search terms is ongoing and we will have another production for defendants as soon as possible – hopefully, by the end of this week. I cannot tell you at this time when we will complete our rolling production, but perhaps we can provide an updated forecast at some point.

Thank you.

Raymond Charles Winter
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From: Lollar, Tirzah <Tirzah.Lollar@arnoldporter.com>

Sent: Monday, October 3, 2022 17:14

To: Raymond Winter <Raymond.Winter@oag.texas.gov>; Andrew Stephens <andrew@hackerstephens.com>; Martin, Meghan C. <Meghan.Martin@arnoldporter.com>

Cc: Eugenia Krieg <Eugenia.Krieg@oag.texas.gov>; Drew Wright <Drew.Wright@oag.texas.gov>; Sinty Chandy <Sinty.Chandy@oag.texas.gov>; Christopher Hilton <Christopher.Hilton@oag.texas.gov>; Amy Hilton <Amy.Hilton@oag.texas.gov>; Benjamin Walton <Benjamin.Walton@oag.texas.gov>; Heather Hacker <heather@hackerstephens.com>; Sheehan, Christian <Christian.Sheehan@arnoldporter.com>; Odell, Christopher M. <Christopher.Odell@arnoldporter.com>; Margolis, Craig D. <Craig.Margolis@arnoldporter.com>; lgodesky@omm.com; brown@blackburnbrownlaw.com; jchapa@omm.com; Michael Moore <Michael.Moore@oag.texas.gov>; dashby@omm.com; Weberman, Melissa L. <Melissa.Weberman@arnoldporter.com>; Ramer, Paula <Paula.Ramer@arnoldporter.com>; Reeder-Ricchetti, Emily <Emily.Reeder-Ricchetti@arnoldporter.com>; Schultz, Leah

Subject: RE: Case 2:21-cv-00022-Z United States of America et al v. Planned Parenthood Federation of America Inc et al

Ray:

We received Texas's first production of custodial documents on Sept 30.

I don't think we have received Texas's hit report for the search terms it is running. Can you please provide the hit report?

Please also provide an update on Texas's production plans. For example, I believe Texas produced 795 documents. When does Texas expect to make its next production? How many more productions do you anticipate Texas making? When does Texas expect to complete its production and produce a privilege log?

Thanks,
Tirzah

Tirzah Lollar
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Sent: Friday, September 23, 2022 5:15 PM

To: Lollar, Tirzah <Tirzah.Lollar@arnoldporter.com>; Andrew Stephens <andrew@hackerstephens.com>; Martin, Meghan C. <Meghan.Martin@arnoldporter.com>

Cc: Eugenia Krieg <Eugenia.Krieg@oag.texas.gov>; Drew Wright <Drew.Wright@oag.texas.gov>; Sinty Chandy <Sinty.Chandy@oag.texas.gov>; Christopher Hilton <Christopher.Hilton@oag.texas.gov>; Amy Hilton <Amy.Hilton@oag.texas.gov>; Benjamin Walton <Benjamin.Walton@oag.texas.gov>; Heather Hacker <heather@hackerstephens.com>; Sheehan, Christian <Christian.Sheehan@arnoldporter.com>; Odell, Christopher M. <Christopher.Odell@arnoldporter.com>; Margolis, Craig D. <Craig.Margolis@arnoldporter.com>; zzz.External.lgodesky@omm.com <lgodesky@omm.com>; brown@blackburnbrownlaw.com; zzz.External.jchapa@omm.com <jchapa@omm.com>; Michael Moore <Michael.Moore@oag.texas.gov>; zzz.External.dashby@omm.com <dashby@omm.com>; Weberman, Melissa L. <Melissa.Weberman@arnoldporter.com>

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Tirzah,

Yes, we anticipate that next week's production will include documents harvested from the custodians whose emails we have previously agreed to search.

Best,

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From: Lollar, Tirzah <Tirzah.Lollar@arnoldporter.com>

Sent: Friday, September 23, 2022 16:00

To: Raymond Winter <Raymond.Winter@oag.texas.gov>; Andrew Stephens <andrew@hackerstephens.com>; Martin, Meghan C. <Meghan.Martin@arnoldporter.com>

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Ray:
Thanks for the information, which we are reviewing. Just to confirm, we are not aware of Texas having produced any custodial documents yet, but of course let me know if we are mistaken. Do you anticipate beginning your production of custodial documents next week?

Thanks,
Tirzah

Tirzah Lollar
Partner | [Bio](#)

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Sent: Friday, September 23, 2022 4:47 PM

To: Lollar, Tirzah <Tirzah.Lollar@arnoldporter.com>; Andrew Stephens <andrew@hackerstephens.com>; Martin, Meghan C. <Meghan.Martin@arnoldporter.com>

Cc: Eugenia Krieg <Eugenia.Krieg@oag.texas.gov>; Drew Wright <Drew.Wright@oag.texas.gov>; Sinty Chandy <Sinty.Chandy@oag.texas.gov>; Christopher Hilton <Christopher.Hilton@oag.texas.gov>; Amy Hilton

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Dear Tirzah,

As requested, here is an update on Texas production to defendants:

- We anticipate making additional rolling production to defendants next week and making further rolling productions in subsequent weeks. I do not currently have an estimate for you as to when our rolling production will be complete. However, we are mindful of the deadlines in the Court's scheduling order.
- We anticipate providing supplemental responses to defendants' discovery requests – including verified interrogatory responses – next week.

As always, let me know if there is anything you wish to discuss.

Best,

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